

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ASSOCIATED INDUSTRIES INSURANCE
COMPANY, INC.,

Plaintiff,

-against-

WACHTEL MISSRY LLP and HOWARD
KLEINHENDLER,

Defendants.

Civ. No. 1:21-cv-03624-LGS

PARTIES JOINT SUBMISSION IN ACCORDANCE WITH THE COURT'S ORDERS
DATED OCTOBER 6, 2022 AND OCTOBER 11, 2022

WHEREAS, on October 6, 2022, the Court entered an Order [dkt. 77], in which the Court ORDERED that the parties' recent letters [dkt. 68-69, 71, 72, and 84] are construed as cross-motions for summary judgment on Defendants' affirmative defenses;

WHEREAS, the Court further ORDERED that, no later than October 14, 2022, the parties shall jointly file all communications between Plaintiff and Defendants referenced in the parties' above-mentioned filings or otherwise pertaining to the resolution of the motions;

WHEREAS, on October 11, 2022, the Court entered a further ORDER [dkt. 80] extending the deadline for the parties' joint submission to November 4, 2022;

NOW, THEREFORE, Plaintiff, Associated Industries Insurance Company, Inc., and Defendants, Wachtel Missry LLP and Howard Kleinhendler, jointly submit the following materials in support of their cross-motions for summary judgment:

Exhibit No.	Bates No.	Document Date
1	AIIC01849-68	8/21/2019
2	AIIC01871-72	8/22/2019
3	AIIC01874-75	8/22/2019
4	AIIC01904-05	9/20/2019

Exhibit No.	Bates No.	Document Date
5	AHC10404-06	12/31/2019
6	AHC11432-37	1/8/2020
7	AHC10131-33	2/7/2020
8	AHC11849-51	2/7/2020
9	AHC08744	2/13/2020
10	AHC09139	2/20/2020
11	AHC06338-39	2/25/2020
12	AHC06346	2/26/2020
13	AHC07577	2/26/2020
14	AHC07331-32	3/1/2020
15	AHC06341-42	3/2/2020
16	AHC06271-72	4/27/2020
17	AHC06210-11	5/21/2020
18	AHC02939	6/8/2020
19	AHC06213-15	6/9/2020
20	AHC11942-44	6/9/2020
21	AHC02582-91	6/19/2020
22	AHC02622-23	6/19/2020
23	AHC00703-13	10/5/2020
24	AHC06377-83	12/11/2020
25	AHC06203-05	1/17/2021
26	AHC06348	2/6/2021
27	AHC08750	2/11/2021
28	AHC01783	2/24/2021
29	AHC03392-99	4/20/2021
30	AHC02628	5/3/2021
31	AHC07256-58	5/6/2021
32	AHC09468-69	9/9/2021
33	AHC12193-200	

Dated: November 4, 2022

Respectfully submitted,

/s/ Kim Hoyt Sperduto

Kim Hoyt Sperduto
S.D.N.Y. Bar No. KS5048
Peter G. Thompson (*pro hac vice*)
April H. Gassler (*pro hac vice*)
SPERDUTO THOMPSON & GASSLER PLC
1050 30th Street, NW
Washington, DC 20007
202-408-8900 (tel)
202-465-8104 (fax)

ksperduto@stglawdc.com
pthompson@stglawdc.com
agassler@stglawdc.com

Counsel for Plaintiff
Associated Industries Insurance Company

/s/ Jeremy King

Jeremy M. King, Esq.
OLSHAN FROME WOLOSKY LLP
1325 Avenue of the Americas
New York, NY 10019
212-451-2300
Fax: 212-451-2222
jking@olshanlaw.com

Counsel for Defendant
Wachtel Missry LLP

/s/ Howard Kleinhendler

Howard Kleinhendler, Esq.
369 Lexington Avenue
Ste 12th Floor
New York, NY 10017
917-793-1188
Fax: 732-901-0832
howard@kleinhendler.com

Defendant (Pro Se)